

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION,

This Document Relates to:

ALL ACTIONS

Case No. 4:22-MD-03047-YGR

MDL No. 3047

Honorable Yvonne Gonzalez Rogers

Honorable Peter H. Kang

**OMNIBUS SEALING STIPULATION
AND [PROPOSED] ORDER
REGARDING DKT. NOS. 890, 891
(JOINT LETTER BRIEF RE: THE
APPROPRIATE NUMBER OF
CUSTODIANS AS TO SNAP INC.)**

Pursuant to Civil Local Rules 7-11 and 79-5, the Court's May 22, 2023 Protective Order (Dkt. No. 290), and the August 1, 2023 Order Granting Motion To File Under Seal; Setting Sealing Procedures (Dkt. No. 341), Defendant Snap Inc. and Plaintiffs (collectively, the "Parties") submit this Omnibus Sealing Stipulation in connection with their Joint Letter Brief Regarding The Appropriate Number of Custodians As To Snap Inc. (the "Joint Letter Brief") and its exhibit filed on May 23, 2024. ECF 890, 891.

The Parties have met and conferred regarding the proposed sealing designations. At this time, Plaintiffs do not oppose the sealing request and reserve all rights to challenge designations and sealing in the future. Accordingly, the Parties stipulate to the following chart.

Case No. 4:22-MD-03047-YGR

OMNIBUS SEALING STIPULATION AND [PROPOSED]
ORDER RE: SNAP'S CUSTODIANS

UNDISPUTED REQUEST TO MAINTAIN A DOCUMENT UNDER SEAL

Dkt. No.	Description	Requested Action	Designating Party	Designating Party's Basis for Sealing	Previously Sealed?
891-2	Appendix A to Joint Letter Brief	Maintain under seal.	Snap	Appendix A to the Joint Letter Brief contains substantial personal identifying information for more than 50 current and former Snap employees who have been proposed as or designated to be document custodians in this case. Appendix A contains descriptive information—including direct quotes from the employees, job titles and descriptions, and other personal identifying information—that could reveal the private identities of Snap's employees. All this information is also presented in a single, accessible chart with explicit reference to the present litigation that may serve as a roadmap for potential bad actors to identify, doxx, harass, and threaten Snap's employees, as they have historically done to other defendants. <i>See</i> Dkt. No. 910-2 (declaration of YouTube).	No.

1 Dated: July 9, 2024

Respectfully submitted,

2 /s/ Lexi J. Hazam

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Attorneys for Defendant Snap Inc.

ATTESTATION

I, Jonathan H. Blavin, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: July 9, 2024

/s/ Jonathan H. Blavin
Jonathan H. Blavin

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19 Pursuant to Civil Local Rules 7-11 and 79-5, the Court's May 22, 2023 Protective Order
20 (Dkt. No. 290), and the August 1, 2023 Order Granting Motion To File Under Seal; Setting
21 Sealing Procedures (Dkt. No. 341), and after consideration of the moving papers and all other
22 matters presented to the Court, the Court rules that good cause exists to seal portions of the
23 following documents related to the Joint Letter Brief Regarding The Appropriate Number of
24 Custodians As To Snap Inc.
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Dkt. No.	Description	Requested Action	Court's Ruling
891-2	Appendix A to Joint Letter Brief Regarding the Appropriate Number of Custodians As To Snap Inc.	Seal in entirety.	Granted _____ Denied _____

IT IS SO ORDERED.

DATED: _____

HONORABLE PETER H. KANG
UNITED STATES MAGISTRATE JUDGE